

O S B O R N L A W , P . C .
43 WEST 43RD STREET, SUITE 131
NEW YORK, NEW YORK 10036

DANIEL A. OSBORN
LINDSAY M. TRUST

TELEPHONE
212 - 725 - 9800

FACSIMILE
212 - 500 - 5115

February 1, 2019

By ECF

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 10007

Re: *Carlos M. Salas et al. v. Peter Salas et al.*,
Case No. 16-cv-002248

Dear Magistrate Judge Freeman:

We write on behalf of defendants Peter E. Salas, Dolphin Advisors, LLC, Dolphin Asset Management Corp., Dolphin Direct Equity Partners, LP and Dolphin Management, Inc. (“Defendants”), to request an extension of time to file Defendants’ response to Plaintiffs’ proposed findings of fact and conclusions of law. This document is currently scheduled to be filed on **February 8, 2019**. Defendants respectfully request a 14-day extension of time, up to and including **February 22, 2019**, to file their document.

This is Defendants’ first request for an extension of time to file Defendants’ response to Plaintiffs’ filing. Defendants have been working on their response but submit that the additional time is necessary in order to sufficiently review and address Plaintiffs’ 75-page submission containing 393 proposed facts and conclusions; Defendants submitted 249.

Hon. Debra Freeman
February 4, 2019
Page 2

Counsel for Plaintiffs Ada Cristina Salas and Carlos M. Salas has informed Defendants' counsel that Plaintiffs do not consent to this relief. *See* E-mail dated February 2, 2019 attached hereto.

Respectfully submitted,



Daniel A. Osborn

cc: Herbert Deutsch, Esq. (by ECF)
Jeremy E. Deutsch, Esq. (by ECF)
Elliot J. Coz, Esq. (by ECF)

From: [Deutsch, Herbert](#)
To: [Dan Osborn](#)
Cc: [Coz, Elliot J.](#); [Deutsch, Jeremy E.](#); [Lindsay Trust](#)
Subject: Re: Salas -- Reply Date
Date: Saturday, February 02, 2019 9:42:20 AM

We oppose your request. Replies are limited to answering and not interposing new materials. In addition you have not provided any reason why you need over a month

Sent from my iPhone

On Feb 1, 2019, at 7:55 PM, Dan Osborn <DOsborn@osbornlawpc.com> wrote:

Gentlemen – we intend to ask for additional time (until February 22) to file our responsive pleading.

Please let me know if you consent so that we can advise the court of your position.

Thank you,

Daniel

Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
(212)-725-9800

This electronic mail transmission may contain privileged, confidential and/or proprietary information intended only for the person(s) named. Any use, distribution, copying or disclosure to another person is strictly prohibited. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email.